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Attorneys for Defendant  
MENTOR WORLDWIDE LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ANITA LAUX,

Plaintiff,

v.

MENTOR WORLDWIDE, LLC;  
MENTOR CORPORATION; ETHICON,  
INC.; JOHNSON & JOHNSON and  
JOHN DOE DEFENDANTS # 1-10,

Defendants.

Case No. 2:16-cv-01026-ODW-AGR

Hon. Otis D. Wright, II

**DECLARATION OF DUSTIN B.  
RAWLIN IN SUPPORT OF  
MENTOR WORLDWIDE LLC'S  
MOTION FOR SUMMARY  
JUDGMENT**

Date: September 11, 2017  
Time: 2:30 p.m.  
Ct. No.: 5D

Pretrial Conference: September 18, 2017  
Trial Date: September 26, 2017

I, Dustin B. Rawlin, declare as follows:

1. I am an attorney at law duly authorized to practice before all courts of the

1 state of Ohio. I was admitted *pro hac vice* to represent Defendant Mentor Worldwide  
 2 LLC in this case. The facts stated hereunder are true, known to me of my own personal  
 3 knowledge, and if called as a witness, I could and would competently testify thereto.

4 2. I am an attorney at Tucker Ellis LLP, attorneys of record for Defendant  
 5 Mentor Worldwide LLC.

6 3. A true and correct copy of Plaintiff's Complaint in the above-captioned  
 7 matter is attached hereto as Exhibit A.

8 4. A true and correct copy of the FDA's May 10, 2000 pre-market Approval  
 9 Order and Summary of Safety and Effectiveness for Mentor Saline Breast Implants  
 10 (P990075) is attached hereto as Exhibit B.

11 5. A true and correct copy of relevant excerpts of the deposition of Pierre Blais,  
 12 Ph.D., dated January 30, 2017, is attached hereto as Exhibit C.

13 6. A true and correct copy of the sworn declaration of Hoshang Kotivand is  
 14 attached hereto as Exhibit D.

15 7. A true and correct copy of relevant excerpts of the deposition of Juris  
 16 Bunkis, dated January 13, 2017, is attached hereto as Exhibit E.

17 8. A true and correct copy of relevant excerpts of the deposition of Susan Kolb,  
 18 MD, dated January 20, 2017, is attached hereto as Exhibit F.

19 9. A true and correct copy of Pierre Blais' expert report prepared for Joann  
 20 Cottengim, which was attached as an exhibit to Mentor's Motion to Exclude Testimony  
 21 of Pierre Blais, Ph.D. filed on February 27, 2007, in *Cottengim v. Mentor Corp.*, No.  
 22 2:05-cv-00161-DLB-JGW (E.D. Ky.) [Doc. 18] is attached hereto as Exhibit G.

23 10. A true and correct copy of Pierre Blais' expert report prepared for Deborah  
 24 Alfred, which was attached as an exhibit to Mentor's Motion to Exclude Testimony of  
 25 Pierre Blais, Ph.D. filed on November 28, 2006, in *Alfred v. Mentor Corp.*, No. 3:05-cv-  
 26 00483-JBC-JDM (W.D. Ky.) [Doc. 26] is attached hereto as Exhibit H.

27 11. A true and correct copy of Pierre Blais' expert report prepared for Elizabeth  
 28 Lakey, which was filed as part of plaintiff's Initial Disclosures on May 27, 2005, in

1 *Lakey v. Mentor Corp.*, No. 1:05-cv-00929-TCB [Doc. 8] is attached hereto as Exhibit I.

2 12. A true and correct copy of the sworn declaration of Nicole Bwrede is  
3 attached hereto as Exhibit J.

4 13. A true and correct copy of the Declaration of Alan C. Milstein in Support of  
5 *Ex Parte* Application to Withdraw as Counsel for Plaintiff Anita Laux and Motion to  
6 Stay All Deadlines for 30 Days, ECF No. 44-2, ¶ 18, is attached hereto as Exhibit K.

7 14. A true and correct copy of the December 17, 2013 order granting Mentor's  
8 Motion to Dismiss in *Clore v. Mentor Worldwide LLC*, No. 17-cv-0003-CVE-TLW (N.D.  
9 Okla. Apr. 24, 2017) is Attached hereto as Exhibit L.

10 15. A true and correct copy of the December 17, 2013 order granting Mentor's  
11 Motion to Dismiss in *Ford v. Mentor Worldwide, LLC*, No. 2:13-cv-06317-SSV-KWR is  
12 Attached hereto as Exhibit M.

13 16. A true and correct copy of the August 21, 2012 minute order granting  
14 Mentor's Motion for Judgment on the Pleadings in *Harris v. Mentor Worldwide LLC*, No.  
15 12-cv-916-JAM-GGH is attached hereto as Exhibit N.

16 I declare under penalty of perjury under the laws of the United States of America  
17 that the foregoing is true and correct and that this declaration is executed by me on this  
18 4th day of August, 2017 at Cleveland, Ohio.

19 DATED: August 4, 2017

Tucker Ellis LLP

20  
21 By: /s/ Dustin B. Rawlin

Dustin B. Rawlin (*pro hac vice*)  
Attorney for Defendant  
Mentor Worldwide LLC